



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF: SR-6J

July 28, 2010

Valerie A. Rule, P.E.
Project Engineer, FBAG Lead Contractor
de maximis, inc.
450 Montbrook Lane
Knoxville, TN 37919

Re: Your May 7, 2010 Letter concerning FWA/Brook (SOU) Inspection Requirements
Fields Brook Superfund Site, Ashtabula, OH

Dear Ms. Rule:

Your May 7, 2010 letter requests U.S. Environmental Protection Agency's (EPA) approval to discontinue quarterly inspections of floodplain cover areas for exposure units 1,2,3,4,5 and 7, as currently required by the approved Fields Brook Post-Closure Operations, Maintenance, and Monitoring Plan (O&M Plan).

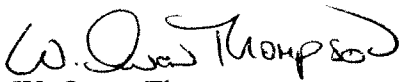
Based on my site visit and review of site history, I agree that quarterly inspection of the downstream exposure units is unnecessary at this point, but I don't think that the inspections should be completely eliminated yet. I will agree to an O&M Plan revision that provides for annual inspections, preferably each spring when vegetation is at a minimum. We can revisit whether to discontinue the inspections during the next Five Year Review.

EPA would like to recommend another revision to the O&M Plan. We suggest adding another section that provides for annual inspection of OU 1, OU 4 and the Fields Brook Landfill for compliance with institutional controls (e.g., document that no one has built a residence or consumed groundwater in the covenant-restricted portions of the floodplain or landfill). This activity could be done at the same time as other inspections by the FBAG, or by the appropriate

property owner for that portion of the Site. Such a change could eliminate the need to prepare separate institutional control plans as called for by the 2009 ESD and 2009 Five Year Review. Peter Felitti and I would be happy to discuss idea this with you .

If you have any questions I can be reached at 312 886-4843.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Owen Thompson". The signature is fluid and cursive, with the first name "W." and last name "Thompson" clearly distinguishable.

W. Owen Thompson
Remedial Project Manager
Superfund Remedial Response Section Seven

cc: Bob Rule, de maximus, inc.
Ralph E. Cascarilla, Walter and Haverfield, LLP
Peter Felitti, U.S. EPA